

# EXHIBIT 22

1 UNITED STATES DISTRICT COURT  
2  
3 EASTERN DISTRICT OF MICHIGAN  
4  
5 SOUTHERN DIVISION  
6  
7 -----) Civil Action No.:  
8 IN RE: FLINT WATER CASES ) 5:16-cv-10444-JEL-MKM  
9 ) (consolidated)  
10 )  
11 ) Hon. Judith E. Levy  
12 ) Mag. Mona K. Majzoub  
13  
14 HIGHLY CONFIDENTIAL  
15 VIDEOTAPED DEPOSITION OF GERALD AMBROSE  
16  
17 Wednesday, June 10, 2020  
18 Volume 1  
19  
20 Remote oral deposition of GERALD AMBROSE,  
21 conducted at the location of the witness in Lansing,  
22 Michigan, commencing at approximately 9:07 a.m., on  
23 the above date, before JULIANA F. ZAJICEK, a  
24 Registered Professional Reporter, Certified Shorthand  
Reporter, Certified Realtime Reporter and Notary  
Public.

1 regulations were being followed at the drinking water  
2 plant?

3 A. I believe the role of the consultant was  
4 to determine if the drinking water was meeting  
5 established standards.

6 Q. The -- there are, Mr. Ambrose, many public  
7 statements you -- that were made either directly by  
8 you or on documents issued under your name that  
9 indicate that -- assurances to the public that the  
10 drinking water was safe. You've been asked some  
11 questions about that today already, and I just want to  
12 be sure I understand what you did to ensure that those  
13 statements were accurate.

14 I could show you some of those documents,  
15 but I think that we've been through some of those  
16 today.

17 A. So, I relied on the Director of Public  
18 Works to assure that the reports were done timely and  
19 accurately.

20 Q. Well, I'm asking you specifically about  
21 public statements that the drinking water was safe and  
22 met all standards.

23 A. Right.

24 Q. Not simply the test reports and the

1       regulatory -- the -- the sampling reports and so forth  
2       that were sent to DEQ, but more as a public-facing  
3       statements that Flint's water was safe and met  
4       standards.

5                          What did you do to ensure that those  
6       statements were accurate before you issued them to the  
7       public?

8                          A.       I was told repeatedly by not only the  
9       Director of the Department of Public Works, but the  
10      utilities director and some of the testing folks that  
11      did the testing that the water was within standards.  
12      I got reports from them, you know, on a regular basis.

13                         Q.       How did those reports -- how were those  
14      reports transmitted to you?

15                         A.       I did not -- I -- those reports were the  
16      responsibility -- the review of those reports were the  
17      responsibility of the utilities director and the  
18      Department -- the Director of the Department of Public  
19      Works.

20                         Q.       And who was the utilities director?

21                         A.       Duffy Johnson.

22                         Q.       I want to ask you about Mr. Hollins. And,  
23      again, forgive me for jumping around, but you had  
24      mentioned that you did have some communications with

1 Harvey Hollins with respect to Flint matters --

2 A. Okay.

3 Q. -- during your term as the emergency  
4 manager. You understood Mr. Hollins to have a role in  
5 Governor Snyder's office, and I'll represent that he  
6 had a title that -- Director of Urban Initiatives or  
7 something of that nature.

8 Could you tell us what the nature of your  
9 communications are -- were with Mr. Hollins as --  
10 while you were emergency manager in Flint?

11 A. Mr. Hollins had received, you know,  
12 received complaints and concerns from various people  
13 in Flint, and his goal was to assure that those  
14 concerns were being addressed, and so he collected --  
15 he would request information from me about what we  
16 were doing and he requested at some point information  
17 on, you know, why -- why the switch to the -- to KWA,  
18 why the switch to the river, what would be the cost of  
19 returning.

20 Q. How did you communicate with Mr. Hollins?

21 A. Generally by phone or by e-mail.

22 Q. And what phones did you have available to  
23 you when you were emergency financial manager?

24 A. What?

1

REPORTER'S CERTIFICATE

2

3 I, JULIANA F. ZAJICEK, a Registered  
4 Professional Reporter, Certified Realtime Reporter,  
5 Certified Shorthand Reporter and Notary Public, do  
6 hereby certify that prior to the commencement of the  
7 examination of the witness herein, the witness was  
8 duly remotely sworn by me to testify to the truth, the  
9 whole truth and nothing but the truth.

10

I DO FURTHER CERTIFY that the foregoing is  
11 a verbatim transcript of the testimony as taken  
12 stenographically by me at the time, place and on the  
13 date hereinbefore set forth, to the best of my  
14 availability.

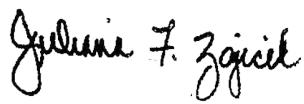
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I DO FURTHER CERTIFY that I am neither a  
16 relative nor employee nor attorney nor counsel of any  
17 of the parties to this action, and that I am neither a  
18 relative nor employee of such attorney or counsel, and  
19 that I am not interested directly or indirectly in the  
20 outcome of this action.

21

IN WITNESS WHEREOF, I do hereunto set my  
22 hand on this 25th day of June, 2020.

23



24

JULIANA F. ZAJICEK, RPR, CSR, CRR